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6 UNITED STATES DISTRICT COURT
7 FOR THE WESTERN DISTRICT OF WASHINGTON
8 AT TACOMA

9 TRESHA COLEMAN,

10 Plaintiff,
11 vs.

12 CITY OF UNIVERSITY PLACE, PIERCE
13 COUNTY, TACOMA UNIFIED SCHOOL
14 DISTRICT, DAN BESETT, LILLIAN
15 EBERSOLE, CHERRY GOUDEAU, and
16 Unknown University Place Police Officers,

Defendants.

NO. C09-5444 FDB

AGREED PROTECTIVE ORDER
REGARDING DOCUMENTS
PRODUCED DURING DISCOVERY

17 THIS MATTER comes before the Court upon the agreement of counsel. The parties
18 agree to stipulate to a protective order in this matter with respect to documents requested in
19 Plaintiff's First Set of Request for Production – No. 1 as follows:

20 1. Photographs obtained by parties during discovery in this lawsuit of all officers
21 who were employed to work in University Place in March 2007 and April 2007, as requested
22 in Plaintiff's first Request for Production No. 1, shall be kept confidential by the discovering
23 party. The party may, however, disclose the photographs to experts, consultants, and
24 witnesses as necessary in order to prepare for such things as motions, depositions, and trial in
25 this matter. The term "party" encompasses the party, his or her attorney, and employees of

1 the attorney's firm. .

2 2. If the documents referenced in paragraph 1 are disclosed to nonparties, the
3 nonparties shall be advised of the confidential nature of the documents and of the need to
4 keep the documents and information contained therein confidential.

5 3. This order in no way affects the right of a party to use documents subject to
6 this order at trial (including pretrial proceedings) provided that the appropriate evidentiary
7 basis can be established.

8 4. At the conclusion of this litigation and any and all appeals arising out of this
9 litigation, any and all copies of the documents shall be destroyed.

10 5. The parties agree that this order is entered without prejudice and that, at any
11 time while this action is pending, any party may move the court for relief from this protective
12 order and/or amendment of the terms of this order for good cause shown.

13 DATED this 8th day of February, 2010.

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16 By: /S/ Michelle Luna Green
17 MICHELLE LUNA-GREEN / WSB# 27088
Deputy Prosecuting Attorney
18 Attorney for Pierce County/
University Place
PH: 253-798-6380 / FAX: 253-798-6713

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/S/ Darryl Parker
DARRYL PARKER/ WSB# 7829
Attorney for Plaintiff
PH: 206-285-1743/ FAX: 206-599-6316

ORDER

The parties, having agreed to the terms of this protective order, and the Court finding the terms of the protective order to be reasonable and necessary for the just resolution of this litigation, now, therefore,

IT IS HEREBY ORDERED that the parties adhere to the terms set forth above as if fully set forth herein.

DONE this 9th day of February, 2010


FRANKLIN D. BURGESS
UNITED STATES DISTRICT JUDGE